## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

TOWN NORTH BANK, N.A., \$\text{co} \text{co} Plaintiff, v. SHAY FINANCIAL SERVICES, INC., UBS FINANCIAL SERVICES, INC.,

MORGAN STANLEY & CO., LLC, MERRILL LYNCH & CO., INC., and J.P. MORGAN SECURITIES LLC, Successor In Interest to BEAR STEARNS & CO., INC.,

Defendants.

Civil Action No. 3:11-cv-03125-L

## PLAINTIFF'S AMENDED MOTION TO EXTEND TIME TO RESPOND TO MOTIONS TO DISMISS AND TO FILE AMENDED COMPLAINT

Plaintiff respectfully files this Amended Motion To Extend Time to Respond to Defendants' Motions to Dismiss and to File Amended Complaint until on or before April 9, 2012. Plaintiff knows the Court's Order dated December 23, 2011 stated that the extended deadlines "will not be extended." Plaintiff's counsel have worked diligently to meet the filing deadline of March 26, 2011, but have had in the last two weeks, and continuing into the next week, client emergencies that have engaged all of the four lawyers in the firm. We respectfully request this additional 14-day extension not for delay only but so that justice may be done. Defendants' reply would likewise be extended two weeks and be due on May 9, 2012.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that this Court grant its Motion to Extend Time to Respond to Motions to Dismiss Complaint and to File Amended Complaint and set Plaintiff's deadline as April 9, 2012 and Defendants' reply deadline as May 9, 2012.

Respectfully submitted,

Stuart M. Reynolds, Jr.

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ATTORNEYS FOR PLAINTIFF TOWN NORTH BANK, N.A.

## AMENDED CERTIFICATE OF CONFERENCE

The undersigned has now heard from counsel for all Defendants, and they do not oppose this motion.

Stuart W. Reynolds,

## CERTIFICATE OF SERVICE

I certify that this Amended Motion for Extension of Time was filed with the Court on March 26, 2012, and a copy was served on counsel of record, as listed below, via the court's electronic filing system on the same date:

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